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April 13, 2005

**DOCKET FILE COPY ORIGINAL**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
c/o Natek, Inc.  
236 Massachusetts Avenue, N.E., Suite 110  
Washington, DC 20002

**RECEIVED**

**APR 13 2005**

Federal Communications Commission  
Office of Secretary

**Re: CC Docket No. 02-6  
Supplement to Waiver Request  
of Wabash Valley Education Center  
Entity No. 130742  
Form 471, Application No. 485945**

Dear Ms. Dortch:

This letter contains supplemental information in support of the waiver request of Wabash Valley Education Center ("WVEC") (Entity No. 130742) filed on March 11, 2005.

As a preliminary matter, please note that the first paragraph of the waiver request filed on March 11, 2005, inadvertently referred to the "February 18, 2004 Form 471 filing window." The waiver request concerns the February 18, **2005** filing window. The remainder of the references in the waiver request are correct.

**Support for Rural Broadband Deployment** WVEC hereby supplements its waiver request by submission of the following additional information demonstrating that grant of the requested waiver would serve the public interest in bringing broadband to rural areas. The instant application would provide funding for schools that serve over 41,000 students spread throughout a largely rural area of Indiana. Attachment 1 hereto is a list of the schools served by WVEC that identifies the towns and counties in which the schools are located. Attachment 2 hereto provides the population figures for those towns and counties (county population is listed only once for each county).<sup>1</sup> Of the counties listed, most are outside of any MSA.<sup>2</sup> Although

<sup>1</sup> Compiled from U.S. Census information.

<sup>2</sup> According to the Metropolitan Statistical Area (MSA) list released by OMB and available at <http://www.whitehouse.gov/omb/inforeg/msa99.pdf>. See 47 C.F.R. § 54.5 definition of "rural area" as one outside the list of MSA's released by OMB.

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Marlene H. Dortch  
Federal Communications Commission  
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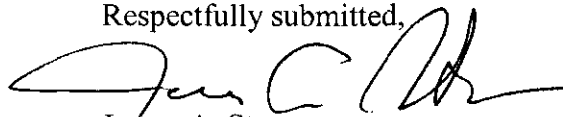
**Thelen Reid & Priest LLP**

five of the counties are located within MSAs, four of those counties are associated with two relatively small cities located in rural areas.<sup>3</sup>

The Commission consistently has affirmed that making broadband Internet access available in rural America has been and continues to be a top priority of the Commission.<sup>4</sup> Certainly, one of the most critical applications of broadband access in rural areas is for its use in schools to enhance educational opportunities for children growing up in rural areas. As such, the grant of the instant waiver would serve the public interest as identified by the Commission.

Should additional information be necessary in connection with this matter, kindly communicate directly with the undersigned.

Respectfully submitted,



James A. Stenger

cc: SLD Correspondence Unit

DC #187840 v2

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<sup>3</sup> Tippecanoe and Clinton counties are in the Lafayette, IN MSA and Howard and Tipton counties are in the Kokomo, IN MSA. Boone county is on the northern edge of the Indianapolis MSA.

<sup>4</sup> Remarks by [then] Commissioner Kevin J. Martin to the U.S. Department of Agriculture Rural Utilities Service's Public Meeting on Rural Broadband Access, June 27, 2002.

## **Attachment 1**

### **Schools served by WVEC and location by town in Indiana**

<b>Name of School</b>	<b>Town Where Located</b>
Attica High School	Attica
Attica Elementary School	Attica
Boswell Elementary School	Boswell
Frontier Elementary	Brookston
Eastlawn Elementary School	Burnettsville
Camden Elementary School	Camden
Frontier Jr-Sr High School	Chalmers
Covington Community High Sch	Covington
Covington Middle School	Covington
Covington Elementary School	Covington
Delphi Community High School	Delphi
Delphi Community Middle Sch	Delphi
Hillcrest Elementary School	Delphi
Fowler Elementary School	Fowler
Clinton Prairie Elem School	Frankfort
Clinton Prairie Jr-Sr HS	Frankfort
Riley Elem Sch	Frankfort
South Side Elementary School	Frankfort
Kyger Elem School	Frankfort
Frankfort Middle School	Frankfort
Suncrest Elementary Sch	Frankfort
Frankfort Senior High School	Frankfort
Galveston Elementary School	Galveston
Granville Wells Elem Sch	Jamestown
South Newton Middle Sch	Kentland
South Newton Senior High Sch	Kentland
South Newton Elementary Sch	Kentland
Taylor High School	Kokomo
Taylor Intermediate School	Kokomo
Taylor Primary School	Kokomo
Taylor Middle School	Kokomo
Howard Elementary School	Kokomo
Northwestern Elementary Sch	Kokomo
Northwestern Sr High Sch	Kokomo
Northwestern Middle School	Kokomo
Lincoln Middle School	Logansport
Logansport Comm High Sch	Logansport
Franklin Elementary School	Logansport

Columbia Elementary School	Logansport
Landis Elementary School	Logansport
Columbia Middle School	Logansport
Fairview Elementary School	Logansport
Meadowlawn Elementary School	Monticello
Roosevelt Middle Sch	Monticello
Twin Lakes Senior High School	Monticello
Oaklawn Elementary School	Monticello
Woodlawn Elementary School	Monticello
Otterbein Elementary School	Otterbein
Oxford Elementary School	Oxford
Benton Central Jr-Sr High Sch	Oxford
Elmwood Elementary School	Peru
Blair Pointe School	Peru
Peru Junior High School	Peru
South Peru Elementary School	Peru
Peru High School	Peru
Holman Elementary School	Peru
Pine Village Elementary Sch	Pine Village
Tri-County Primary School	Remington
Van Rensselaer Elementary School	Rensselaer
Monnett Elementary School	Rensselaer
Rensselaer Middle School	Rensselaer
Rensselaer Central High Sch	Rensselaer
Rossville Senior High School	Rossville
Rossville Elementary School	Rossville
Pioneer Elementary School	Royal Center
Pioneer Jr-Sr High School	Royal Center
Western Middle School	Russiaville
Western High School	Russiaville
Western Intermediate School	Russiaville
Western Primary School	Russiaville
Tri Central Jr-Sr High School	Sharpsville
Tri Central Elementary	Sharpsville
Western Boone Jr-Sr High Sch	Thorntown
Thorntown Elementary School	Thorntown
Tipton Elementary School	Tipton
Tipton Middle School	Tipton
Tipton High School	Tipton
Lewis Cass Jr-Sr High School	Walton
Thompson Elementary School	Walton
Cumberland Elementary School	West Lafayette
Happy Hollow Elementary	West Lafayette

West Lafayette Jr/Sr High Sch  
Warren Central Elem Sch  
Seeger Memorial Jr-Sr HS  
Williamsport Elementary Sch  
Tri-County Middle-Senior High  
Tri-County Intermediate School

West Lafayette  
West Lebanon  
West Lebanon  
Williamsport  
Wolcott  
Wolcott

## Attachment 2

**Population figures for towns and counties where WVEC schools served are located.**

Town	Town Population	County	County Population
Attica	3478	Fountain County	17700
Boswell	803	Benton County	9207
Brookston	1675	White County	24985
Burnettsville	363	White County	
Camden	575	Boone County	48277
Chalmers	498	White County	
Covington	2494	Fountain County	
Delphi	2981	Carroll County	20226
Flora	2216	Carroll County	
Fowler	2344	Benton County	
Frankfort	16593	Clinton County	33972
Galveston	1497	Cass County	40752
Jamestown	926	Boone County	48277
Kentland	1743	Newton County	14360
Kokomo	45956	Howard County	84838
Logansport	19466	Cass County	
Monticello	5586	White County	
Otterbein	932	Benton County	
Oxford	1236	Benton County	
Peru	12915	Miami County	36199
Pine Village	257	Warren County	8747
Remington	1281	Jasper County	30815
Rensselaer	6133	Jasper County	
Rossville	1511	Clinton County	
Royal Center	827	Cass County	
Russiaville	1139	Howard County	
Sharpsville	619	Tipton County	16534
Thorntown	1543	Boone County	
Tipton	5272	Tipton County	16534
Veedersburg	2274	Fountain County	
Walton	1053	Cass County	
West Lafayette	29081	Tippecanoe County	152001
West Lebanon	803	Warren County	
Williamsport	1958	Warren County	
Wolcott	1958	White County	